

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ATLANTIC CASUALTY INSURANCE COMPANY,

Plaintiff,

- against -

FORTHRIGHT CONSTRUCTION, INC., WONDER
WORKS CONSTRUCTION CORP., AND VASILIS
AFTOUSMIS, and CONSTANTIA AFTOUSMIS,

Defendants.

07 CIV 4098

ANSWER

Defendants VASILIS AFTOUSMIS, and CONSTANTIA AFTOUSMIS (“Defendants”) by their attorney Law Offices of Steve Newman as and for their answers to plaintiff’s complaint herein alleges as follows:

THE NATURE OF THIS ACTION

1. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “1” of the complaint.
2. Admits each and every allegation of paragraph “2” of the complaint.
3. Denies each and every allegation of paragraph “3” of the complaint.
4. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraphs “4”, “5”, “6” and “7” of the complaint.

JURISDICTION AND VENUE

5. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraphs “8”, “9”, “10”, “11”, “12”, and “13” of the complaint.

THE PARTIES

6. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraphs “14”, “15”, and “16” of the complaint.
7. Admits each and every allegation of paragraph “17” of the complaint.

THE AFTOUSMIS ACTION

8. Admits each and every allegation of paragraphs “18”, “19”, “20”, “21”, and “22” of the complaint.
9. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraphs “23” and “24” of the complaint.

THE INSURANCE CONTRACT

10. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraphs “25”, “26”, “27”, and “28” of the complaint.

FIRST CAUSE OF ACTION

11. Defendants answering paragraph “29” repeats and realleges each of the foregoing responses to paragraphs “1” through “28” as if fully set forth herein.
12. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraphs “30”, “31”, and “32” of the complaint.

SECOND CAUSE OF ACTION

13. Defendants answering paragraph “33” repeats and realleges each of the foregoing responses to paragraphs “1” through “32” as if fully set forth herein.
14. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraphs “34” through “39” as if fully set forth herein.

WHEREFORE, defendants VASILIS AFTOUSMIS and CONSTANTIA AFTOUSMIS demands judgment dismissing plaintiff's complaint herein and awarding defendants the costs and disbursements of this action and such other and further relief as this court may deem just and proper.

Dated: New York, New York
November 20, 2007

Respectfully submitted,

Law Offices of Steve Newman
Steve Newman (8351)
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